

July 18, 2022

Via ECF

The Honorable Edgardo Ramos
 United States District Judge
 Thurgood Marshall U.S. Courthouse
 40 Foley Square
 New York, NY 10007

Defendant's motion to seal is granted.
 SO ORDERED



Edgardo Ramos, U.S.D.J
 Dated: July 19, 2022
 New York, New York

**Re: *Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd., et al.*,
 No. 19-cv-10823-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Defendants Kingate Global Fund, Ltd. and Kingate Euro Fund, Ltd. (the “Funds”), pursuant to Paragraph 3.ii of Your Honor’s Individual Practices, for approval to file sealed versions of three exhibits appended to the Funds’ Rule 37.2 letter requesting a pre-motion discovery conference to address six non-parties’ (the “Investors”)¹ refusal to produce relevant, non-privileged documents. The Funds’ letter attaches as exhibits documents that DBSI and one Investor (Stone Lion Capital Partners LP) designated as “Confidential” or “Highly Confidential” under the Protective Order in this case. *See ECF No. 48 ¶ 2(a)-(b).*² The Funds filed copies of the same documents as exhibits to their March 21, 2022 pre-motion conference letter, at ECF Nos. 105-1, 105-3, and 105-4. The Court granted the Funds’ motion to file these documents under seal on March 22, 2022. ECF Nos. 107, 110. For the same reasons, the Funds respectfully request the Court grant this letter motion to seal.

Respectfully submitted,

/s/ Andrew R. Dunlap
 Andrew R. Dunlap

/s/ Hugh M. McDonald
 Hugh M. McDonald³

Cc: Counsel of Record

¹ The six Investors are: Centerbridge Partners LP, Farallon Capital Management LLC, Glendon Capital Management LP, Solus Alternative Asset Management LP, Stone Lion Capital Partners LP, and Third Point LLC. White & Case LLP represents Plaintiff Deutsche Bank Securities Inc. (“DBSI”) and all six Investors.

² The Funds take no position on and reserve all rights to challenge these confidentiality designations.

³ Pillsbury Winthrop Shaw Pittman LLP represents the Funds in enforcing their subpoena against Farallon and Perry Capital LLC. Selendy Gay Elsberg PLLC represents the Funds in this action in all other capacities, including against DBSI and the remaining investors subpoenaed by the Funds.